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- 1) Indicate the format in which you would like to receive your Public Proposals Monograph (PPM), Report of the Hearing (ROH) and Final Action Agenda (FAA):

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(*Note: A paper copy will not be sent to you if you have chosen the CD or Download format.)

- 2) PLEASE TYPE OR PRINT CLEARLY: FORMS WILL BE RETURNED if they contain unreadable information.

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Submitted on Behalf of:	Alliance for Fire and Smoke Containment and Control (AFSCC)					
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- 3) ***Signature:** x Signature on File (see over)

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- 4) **Cost Impact:** Indicate if this Proposal: ☐ will ☐ will not increase the cost of construction.

- 5) Indicate appropriate International Code(s) associated with this Public Proposal – Please use Acronym:

If you have also submitted a separate coordination change to another I-Code, please indicate the code: _____
(See back of this form for list of names and acronyms for the International Codes).

- 6) Revision to: Section X Table 503 Figure

- 7) **PROPOSAL** Please check appropriate box:

☐ Revise as follows: ☐ Add new text as follows ☒ Delete and substitute as follows: ☐ Delete without Substitution(s):

Show the proposed NEW, REVISED or DELETED TEXT in legislative format: ~~Line through text to be deleted.~~ Underline text to be added.

Delete Table 503 in its entirety and substitute the following table. Underlining of the new text has been omitted for clarity.

TABLE 503 ALLOWABLE HEIGHT AND BUILDING AREAS

Height limitations shown as stories and feet above grade plane.

Area limitations as determined by the definition of "Area, building", per floor

Height (ft)										
		TYPE I		TYPE II		TYPE III		TYPE IV	TYPE V	
		A	B	A	B	A	B	HT	A	B
		UL	160	65	55	65	55	65	50	40
Group	Height(S)									
A-1, A-2, A-3, A-4 > 1000	S A	UL UL	4 29,900	Not Permitted						

A-1, A-2, A-3, A-4 >300 ≤ 1000	S A	UL UL	4 29,900	2 13,500	NP NP	2 13,500	NP NP	2 13,500	2 10,500	NP NP
Any A ≤ 300	S A	UL UL	12 29,900	2 13,500	1 9,100	2 13,500	1 9,100	2 13,500	2 10,500	1 6,000
B, F-1, M, S-1	S A	UL UL	12 39,900	4 18,000	2 12,000	4 18,000	2 12,000	4 18,000	3 14,000	2 8,000
E, I-4	S A	UL UL	4 45,200	2 20,200	1 13,500	2 20,200	1 13,500	2 20,200	2 15,700	1 9,100
F-2, S-2	S A	UL UL	12 59,900	4 27,000	2 18,000	4 27,000	2 18,000	4 27,000	3 21,000	2 12,000
I-1	S A	UL UL	3 15,100	2 6,800	NP NP	2 6,800	NP NP	2 6,800	2 5,200	NP NP
I-2	S A	UL UL	3 15,100	1 6,800	NP NP	1 6,800	NP NP	1 6,800	1 5,200	NP NP
I-3	S A	UL UL	2 15,100	Not Permitted ⁷						
R-1, R-2, R-4 ^a	S A	UL UL	12 29,900	4 13,500	2 ⁹ 9,100 ⁹	4 13,500	2 ⁹ 9,100 ⁹	4 13,500	3 10,500	2 ⁹ 6,000 ⁹
R-3	S	UL	3	3	3	3	3	3	3	3
	A	Unlimited								
H-1	S A	1 15,000 UL	1 12,400	1 5,600	1 3,700	Not Permitted				
H-2	S A	UL 15,000	2 12,400	1 5,600	1 3,700	1 5,600	1 3,700	1 5,600	1 4,400	1 2,500
H-3	S A	UL UL	5 24,800	2 11,200	1 7,500	2 11,200	1 7,500	2 11,200	2 8,800	1 5,100
H-4, H-5	S A	3 UL	3 39,900	3 18,000	2 12,000	3 18,000	2 12,000	3 18,000	3 14,000	1 8,000
U	S A	UL UL	5 35,500	4 19,000	2 8,500	3 14,000	2 8,500	4 18,000	2 9,000	1 5,500

A - Floor area per story in square feet (x 0.093 for m²)

H - Building height in number of stories.

UL - Unlimited.

NP - Not Permitted.

^a - Group R-4 occupancies shall not be greater than 2 stories in height and shall be of not less than 1 hour fire-resistive construction throughout where the second story exceeds 3,000 square feet.

8) SUPPORTING INFORMATION (State purpose and reason, and provide substantiation to support proposed change):

This proposed amendment simply takes Table 5-A out of the 1997 Uniform Building Code (UBC) and replaces Table 503 in the 2006 ICC International Building Code (IBC). Table 5-A has also been modified using the appropriate IBC occupancy classifications substituted for the UBC use groups and the appropriate IBC types of construction designations substituted for the UBC types of construction. Thus, the height and area limits specified in the IBC are deleted and replaced with those specified in the 1997 UBC upon which the 2001 California Building Code (CBC) is based.

In addition, several sections of the IBC are proposed to be revised by separate proposed amendments to make the height and area requirements, including modifications for increases in heights and areas, more consistent with the UBC. Section 504.2 Automatic Sprinkler System Increase has been proposed to be revised to eliminate the height increase allowed for residential occupancies sprinklered in accordance with NFPA 13R since the UBC does not allow any trade-offs or allowances for the use of a residential sprinkler system. Section 504.2 is also proposed to be revised to indicate that the height increase permitted is limited to one story without an increase in building height based on feet and the height increase can only be allowed when the automatic sprinkler system is installed in accordance with NFPA 13, not NFPA 13R. This is consistent with the UBC which does not allow an increase in height or area for buildings protected with a residential sprinkler system. Presently, the 2006 IBC will not only allow a one story height increase, but also a 20 foot height increase in actual building height. This section was also amended to not allow the use of both a story height increase and an area increase with the installation of an automatic sprinkler system since the IBC will allow both increases to be used in the same building.

And, Section 506.3 Automatic Sprinkler Increase has been proposed to be modified to not allow the increase in building area if an increase in building height is taken as similarly discussed above for Section 504.2. Section 506.4 Area Determination has also been modified to limit the maximum floor area of a multistory building to twice that allowed for a single story building which is consistent with the UBC as compared to the IBC which allows tripling the single story building area for multistory buildings.

The reason for these significant proposed amendments to the IBC is to assure that the present level of fire and life safety being constructed into buildings under the 1997 UBC will be maintained when the IBC is adopted. Otherwise, the adoption of the 2006 IBC without the substituted height and area table and related amendments, in effect, will "lower the bar" for built-in fire resistive and noncombustible construction that has been provided under the UBC. This lowering of the bar over time will result in greater property damage and the potential for more injuries and deaths caused by fires. This will also have an impact on fire fighter safety since buildings will be able to be built much larger without having to provide the same degree of fire resistance nor limit the use of combustible construction.

We can make this statement because we have conducted an analysis of the allowable heights and areas permitted by the IBC as compared to the 1997 UBC. The analysis clearly shows that for the vast majority of cases, especially for the higher types of construction, the IBC will allow substantially greater areas and taller buildings than the 1997 UBC. This has also been substantiated in two articles authored by Mark Kluver of the Portland Cement Association who made a comparison of the International Building Code (IBC) to the UBC for height and areas for certain occupancy classifications. It is also interesting to note the differences in the fire loss records for various regions of the country as compared to the western region where the UBC is the dominant code adopted. These comparisons are shown and discussed in the two articles referenced above.

The IBC allows significantly greater areas and heights than the UBC for several reasons. First, the base allowable heights and areas were developed using the "lowest common denominator" approach which, in essence, took the greatest allowable heights and areas of any of the three regional model building codes for each occupancy (use group) and put them in the table as the base value. The stated purpose for that was to not cause existing buildings in any part of the country to be nonconforming with the IBC. Furthermore, the IBC allows the practice of "double dipping". This is the case where the building allowable area, as well as the building allowable height, is permitted to be increased with the installation of an automatic sprinkler system. As stated above, the UBC does not permit both increases to be taken in the same building. So under the UBC the designer needs to decide whether to use the sprinkler system for an increase in allowable area or, as an alternative, for an increase in the allowable height of a building. Another factor involves the total building area limit for multistory buildings. The UBC places a limit of twice that allowed for a single story building, whereas the IBC allows a tripling of the single story building area for buildings that are three or more stories in height. This can result in a significantly greater allowable area as compared to the UBC.

We should point out that during preliminary studies of the adoption of the 2000 IBC by Clark County, NV, their comparisons of the allowable heights and areas between the UBC and the IBC raised significant concerns. The Clark County, NV, code enforcement officials have expressed concerns that they need to be able to maintain the level of fire and life safety they currently provide based on their adoption of the 1997 UBC which will require significant amendments to the IBC including the height and area tables to achieve that. We would refer you to a website where this process has been documented and made available for public review. It is www.co.clark.nv.us/development_services/bldg_codes/00ibc_amend.pdf.



SUPPORTING INFORMATION *Continued* (Attach additional sheets as necessary)

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Table 503 05.12-15.doc